

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

.....X  
JAGIR SINGH, individually and derivatively  
as a member of  
RSM PROPERTY GROUP LLC

Plaintiff,

**DOCKET # 20-cv-04919-GRB-  
ARL**

**Defendants' FRCP 26  
Initial Disclosure**

-against-

SUKHJINDER SINGH;  
RAGHBIR SINGH;  
RSM PROPERTY GROUP LLC;  
SM CONTRACTORS CORP.

Defendants.

.....X  
Pursuant to FRCP 26(a)(1), SUKHJINDER SINGH, RAGHBIR SINGH, RSM  
PROPERTY GROUP LLC, AND SM CONTRACTORS CORP. by and through their  
attorneys makes his mandatory initial disclosures as follows:

**1. Individuals Likely to Have Knowledge of Discoverable Facts**

<b>Name and Title</b>	<b>Contact Information</b>	<b>Discoverable Information</b>
Jagir Singh	c/o Shiryak, Bowman, Anderson, Gill & Kadochnikov, LLP  80-02 Kew Gardens Rd #600, Kew Gardens, NY 11415	Plaintiff in this action and has knowledge of the underlying facts.
Sukhjinder Singh	c/o Ali & Bains P.C. 118-35 Queens Blvd Forest Hills, NY 11375	Member of RSM Property Group LLC. Has knowledge of real property purchases, construction and relevant records

Raghbir Singh	c/o Ali & Bains P.C. 118-35 Queens Blvd Forest Hills, NY 11375	Entered into Agreement with Plaintiff. Has knowledge of expenses.
Terrence Daugherty, Esq.	Law Offices of Terrance J. Dougherty, Esq.  199 Jericho Turnpike, Suite 203  Floral Park, NY 11001	Represented RSM Property Group LLC in real estate closing. Negotiated escrow agreement.
Nehal Trivedi, Esq.	DiCrescio & Trivedi, LLP 400 Jericho Turnpike, 318 Jericho, New York 11753	Represented RSP Property Group LLC in real estate closing.
Hampton Partners LLC	60 Cutter Mill Road, # 505 Great Neck, NY 11021	Lender who financed purchase and construction of 9904 Glenwood Road

## 2. Relevant Documents in Possession of Defendants and its Counsel

Category of Documents, Electronically Stored Information, or Tangible Things	Location of Documents
Closing Statements and Documents from closing.	In possession of Raghbir Singh
Closing files for 9900 Glenwood Road	In possession of Raghbir Singh
Closing files for 9904 Glenwood Road	In possession of Raghbir Singh
Records of expenses in Construction	In possession of Sukhjinder Singh

Defendants have not retained any experts at this time. Defendants reserve their right to supplement this response and retain experts if necessary.

4. **Computation of Damages.**

Defendants seek attorney's fees from plaintiff for defending action.

5. **Liability Insurance.**

N/A

Dated: January 15, 2021  
Queens, NY

Tejinder Bains, Esq.  
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